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UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS

VALDEMARAS CEINORIUS,)	
VITALIJ CHRISONOPULO,)	
FIODOR IGNATOV,)	
VIKTOR KUZNECOV,)	
ANATOLIJ MATVEJEV,)	
NIKOLAJ NIKULIN,)	
VALERIJ POTAPOV, and)	
VLADIMIR ULJANOV,)	
Plaintiffs)	
)	Civil Action
V.)	
)	No. 03-CV-12270-RWZ
ARTHUR FRANCO and)	
JOHN G. HADAYIA,)	
Defendants)	

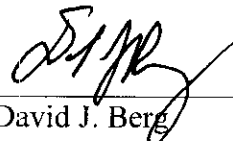
AFFIDAVIT OF DAVID J. BERG

1. I am David J. Berg, and I am counsel to the Plaintiffs in this case.
2. While I customarily use contingent fee agreements with my clients (and did with the instant Plaintiffs), I represent some clients in front of the Department of Labor in Longshore cases, and bill my services at \$200 per hour in those cases.
3. The attached bill is an accurate statement of the time that I have spent on this case and of the costs that my firm has incurred in this case.

SUBSCRIBED AND SWORN TO UNDER THE PAINS AND PENALTIES OF PERJURY

7/14/04

Date



David J. Berg

BILL

8/22/03	review correspondence from Mr. Pavlakis re potential case, research information about defendants	2.0
8/25/03	more research about defendants, discussion with Attorney Latti, email to Mr. Pavlakis re whether to take case	1.5
8/26/03	review Ms. Latti's email to Mr. Pavlakis	0.2
8/29/03	review fax from Mr. Pavlakis, discuss case with other lawyers	0.6
9/26/03	review email from Mr. Pavlakis, response email	0.5
9/29/03	review email from Mr. Pavlakis, letter to USCG re abstract of title	0.3
10/6/03	review info from USCG	0.2
10/9/03	review fax from Mr. Pavlakis re client info	0.5
10/20/03	organize client material for file, email Mr. Pavlakis re same	1.0
10/21/03	review vessel mortgage	0.1
10/28/03	continue organizing client material, draft complaint, further research on defendants, letter to Mr. Pavlakis re fee agreements	2.7
10/30/03	revise complaint, draft letter to AG re Mass wage loss claim	1.7
10/31/03	read fax from Mr. Pavlakis, review asset check on Mr. Hadayia, research law on preliminary injunctions	0.8
11/3/03	revise letter to AG, research law on attachments, review asset check on Mr. Franco, discuss case with investigator	0.8
11/7/03	revise complaint	0.2
11/10/03	finalize complaint, seaman's affidavit, and cover sheet, letter to court, review additional documents sent by Mr. Pavlakis, send	1.0
11/14/03	discuss case with secretary, prepare civil action category sheet	0.3
11/18/03	review notices from court and letters from AG	0.3
11/19/03	prepare service of process	0.3
11/20/03	revise amended complaint, letter to court re filing	0.3
11/25/03	2 letters to process server	0.3
12/11/03	letter to Mr. Pavlakis	0.2
12/24/03	letter to process server	0.2
1/9/04	letter to court re return of service	0.2
1/13/04	letter to court re return of service	0.2
1/19/04	t/c with Mr. Franco	0.1
1/23/04	t/c with Attorney Flanagan re the case	0.3
2/4/04	t/c with Attorney Flanagan re the case	0.1
2/11/04	t/c with Attorney Calabro re the case	0.1
2/17/04	review fax from Attorney Calabro, draft motion for default against Hadayia	0.3
2/20/04	t/c with Attorney Calabro re the case, finish and file motion for	0.5
2/27/04	review file, message to Attorney Calabro re answer	0.1
3/3/04	t/c with Attorney Calabro, prepare motion for default against	0.5

3/29/04	review file, review law on default judgments, email to Pavlakis	0.5
5/12/04	prepare affidavits for clients to sign, email to Pavlakis	1.5
6/21/04	email to Pavlakis	0.1
6/28/04	research default judgment, draft motion and memo for default judgment	1.0
6/29/04	email to Pavlakis	0.1
7/8/04	revise motion and memo for default judgment	0.2
7/12/04	revise motion and memo for default judgment, research law on chapter 149 and attorney's fees	1.0
7/14/04	finish motion and memo for default judgment, letter to court re	1.0
Total		20.4

At \$200 per hour	\$4,080.00
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Costs

private investigation fee to locate defendants and potential assets	500.00
service of summons on defendants	121.10
United States Coast Guard National Vessel Documentation Center to determine ownership of defendants' vessel	4.00
West Group (WESTLAW)	42.13
photocopying	13.80
Total	781.03

TOTAL	\$4,861.03
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